

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-X

CATHERINE MCKOY, MARKUS FRAZIER and  
LYNN CHADWICK individually and on behalf of  
all others similarly situated,

Plaintiffs,

- against -

THE TRUMP CORPORATION and DONALD J.  
TRUMP, in his personal capacity,

Defendants.

-X

Case No. 18-cv-09936(LGS)(SLC)

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that, upon the annexed letter brief of Peter T. Shapiro, Esq., and all prior proceedings herein, the undersigned will move at the United States Courthouse, 40 Foley Square, Courtroom 1106, New York, New York 10007, before the Honorable Lorna G. Schofield, on a date to be determined by the Court, for an Order: (a) pursuant to 28 U.S.C. § 1367(c) dismissing this case based on a discretionary determination that it would be inappropriate to exercise supplemental jurisdiction; or alternatively (b) pursuant to Rule 21, F. R. Civ. P., severing each Plaintiff's claims and pursuant to 28 U.S.C. § 1404(a) transferring Plaintiff Catherine McKoy's claims to the United States District Court for the Central District of California, Plaintiff Markus Frazier's claims to the United States District Court for the District of Maryland, and Plaintiff Lynn Chadwick's claims to the United States District Court for the Eastern District of Pennsylvania and; (c) granting such other and further relief as is just and proper.

Dated: New York, New York  
October 24, 2023



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

A conference will be held regarding Defendants' motion on **November 8, 2023, at 4:15 P.M.** The conference will be telephonic and will take place on the following line: 888-363-4749; access code: 558-3333. The start time is approximate but the parties shall be prepared to begin at the scheduled time.

Dated: November 1, 2023  
New York, New York